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Mr. Thomas Wheeler, Chairman  
Federal Communications Commission  
445 12th Street SW,  
Washington, DC 20554

Dear Mr. Wheeler,

We are writing to you today to (1.) express our concerns about the E-rate program (pg 2) and to (2.) ask you to respond quickly to the request to fund ~~Priority 2 services for~~ 90% program qualified applicants at the 60% level rather than "zero" for Federal Year 2013 (our fiscal year 2014).

The South Baltimore Learning Center (SBLC) is a small organization that produces large outcomes when it comes to helping high school dropouts earn their high school diploma. We are the top performing program in Baltimore City and one of the top in the State of Maryland. SBLC has participated in the E-Rate program since 2001, and has made every effort to abide by every rule. Our staff has attended trainings and established working relationships with key E-Rate/USAC personnel to ensure our success with the program.

*SBLC is deeply disturbed by the recent decision made by the FCC in month nine of the current funding year (2013/2014) not to fund Basic Maintenance services for 90% qualified programs. For SBLC this is a substantial loss in expected funding. We are in year 2 of our current E-rate approved Technology Plan and have signed and agreed to a multi-year contract for basic maintenance service. To completely deny funding of Priority 2 services and notify us in March 2014 of this decision, not only puts SBLC in a major budget constraint, but it puts ALL 90% programs (school and library applicants) who requested priority 2 services in a bad situation. We had no reason not to expect our normal and reasonable reimbursement funding based upon previous years and also the submitted and E-rate approved Technology Plan/budget. Each school and library is scrambling to figure out how we will be able to pay for this unexpected loss of funding. For SBLC this is over \$20,000.*

SBLC understands the importance of the expansion of broadband technologies and the enormous price tag that is associated with the FCC's decision. *But SBLC feels strongly that a reduction of the funding to 60% for Priority 2 services would be a fairer option because of the lateness of the FCC decision. This 60% funding of Priority 2 requests would have lessened the financial impact on the qualified 90% applicants requesting these services, and it could still have provided the FCC with the needed funding to apply towards Priority 1 services.*

Mr. Wheeler, SBLC has devoted over 20 years of its time and effort in developing a successful strategy for educating learners. A great deal of our success is attributed to participation in the E-Rate program. The E-Rate program provides small schools the opportunity to afford quality products and services to better the communities they service. SBLC has reached out to other small, independent schools (as well as vendors) in the State of Maryland that participate in the E-Rate program (and has notified our Congressional members) to be sure they also express how much of an impact the recent FCC decision will have on their organization/business.



Not only will the FCC funding decision impact us this year, but it appears that it could also impact future years as well. As stated earlier, SBLC understands the importance of needing to fund more Priority 1 services. *However, to make this funding decision so late in the current year is not fair to the schools that need and counted on these funds* – we are the schools that serve the largest number of students who live in poverty, and access to technology in school for their education is critical to their progress and success.

SBLC has successfully participated in the E-Rate program over the years. Recently, the organization has noticed a change in the E-Rate program that is concerning. *We would like to share some of our concerns with you:*

1. The selective review process has increased in complexity and in the amount of time it takes. The process is onerous and needs to be simplified. (SBLC does not hire a consultant---we do our own application.)
2. There seems to be little or no communication between previous and new reviewers when conducting the review of applications. The same review questions are repeated each year—even though the information should be on file.
3. The wait time between the application being submitted and the notification of the applicant regarding approval of funding and services has increased from October of the funding year to March (which is entirely too long). The funding process/review timeline used to be shorter in the earlier years of the program.
4. We believe the department is understaffed and also seems to lack enough training thereby causing a longer review process. This wastes both government dollars and program applicant dollars. (We did notice that more Congressional funding is being requested by the FCC in 2015 for additional staff to accommodate reform activity.)
5. SBLC would like clarity on whether the length of the E-rate review by USAC has any bearing on the amount of funding an applicant receives, especially when the applicant is being pushed or delayed to a later funding wave?

We hope that you will respond to our concerns above and also respond quickly to our request to fund Priority 2 services for all 90% program qualified E-rate applicants at the 60% level (rather than zero) for the 2013 – 2014 year.

Sincerely,



Sonia Socha, Executive Director



Jessie Moore, Director of Technology

cc/ U. S. Senator Barbara Mikulski, U. S. Senator Ben Cardin, Congressman John Sarbanes, Congressman Elijah Cummings, Congressman Dutch Ruppersberger, MD State 46<sup>th</sup> District, Mayor Stephanie Rawlings-Blake, Greg Talley, MSDE